

**REMARKS**

Claims 1-12 and 22-24 are currently pending. Claims 1-12 and 22-24 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,005,812 (Mullarkey) in view of U.S. Patent No. 5,796,285 (Drouot) and U.S. Patent No. 6,249,473 (Lau).

Regarding the rejection of independent Claim 1 under 35 U.S.C. §103(a), the Examiner states that the combination of Mullarkey in view of Drouot and Lau teaches each and every limitation of Claim 1. After reviewing the cited references, it is respectfully submitted that the Examiner is incorrect.

First, Claim 1 includes the recitation of a plurality of local DC voltage generators distributed throughout the SOC chip, each local DC voltage generator independently supplying voltage to at least one unit of the plurality of subsystems. In the rejection, the Examiner states that FIG. 3 of Drouot discloses the plurality of local DC generators, as recited by Claim 1 (e.g., see, Office Action, Page 3 top). However, after reviewing FIG. 3 and the corresponding text of Drouot, we could not find reference to a plurality of local DC voltage generators distributed throughout the SOC chip, as recited by Claim 1. Moreover, the SOC chip, as defined by Claim 1, includes a plurality of subsystems having a plurality of units. The Examiner equates the plurality of subsystems having a plurality of units with elements (84), (86), (88), and (90) of Mullarkey. However, with reference to Column 5, Lines 5-11, Mullarkey, teaches an electronic system (82) includes an input device (84), an output device (86), a processor device (88), and a memory device (90) which are shown as separate units in FIG. 3 of Mullarkey. Mullarkey then teaches the any of one of the input, output, and processor devices can also incorporate the DRAM device (10). In other words, according to DRAM device (10) can be incorporated with an input,

output or processor devices. However, this does not teach or suggest the recitation of a plurality of local DC voltage generators distributed throughout the SOC chip, each local DC voltage generator independently supplying voltage to at least one unit of the plurality of subsystems, as recited by Claim 1.

Second, the Examiner states that the plurality of DC voltage generators, as recited by Claim 1, is disclosed by FIG. 1 (which the Examiner stated in a conversation on October 26, 2006, was mistakenly identified as FIG. 3) Drouot. Thereafter, the Examiner states that the DC voltage generator, as recited by Claim 1, is disclosed by elements (11-17) of Drouot and elements (18) and (20) of Lau. This use is inconsistent and does not lead one to conclude that these elements, pulled from separate sources, would be incorporated on a single SOC. Moreover, the Examiner's assertion would lead one to conclude that FIG. 1 of Drouot, by itself, does disclose each and every limitation of the DC voltage generator as recited by Claim 1 as per the Examiner's previous assertion (c.f., Lines 6-7 with 11-12, of Page 3 of the Office Action).

Furthermore, Claim 1 includes the recitation of a pump system receiving the pump control signal and outputting the at least one voltage level in accordance with the pump control signal and a pump system receiving the pump control signal. The Examiner equates the pump system, as recited by Claim 1, with element (4) of Drouot and equates the pump control signal, as recited by Claim 1, with the ENABLE, as shown in FIG. 1, of Drouot. However, with reference to FIG. 1 of Drouot, element (4) does not receive ENABLE. Rather element (4) receives logic ON/OFF (as shown by FIG. 3) generated by a gate (28). Accordingly, Drouot cannot teach or suggest the recitation of a pump system receiving the pump control signal and outputting the at least one voltage level in accordance with the pump control signal and a pump system receiving the pump control signal, as recited by Claim 1. Moreover, Claim 1 includes the added limitation

of outputting the at least one voltage level in accordance with the pump control signal, a distinguishing element of the present invention that has not addressed by the Examiner in the Office Action. Moreover, it is well established in the prosecution history of the present application that the term in accordance with refers to a relationship between two values (e.g., see, the Office Action dated October 18, 2004 at Page 2, in which it was stated by the Examiner “in accordance with’ generally refers to a relationship between two values, rather than mere responsiveness.”

Accordingly, for at least the above-stated reasons, it is respectfully requested that the rejection of Claim 1 under 35 U.S.C. §103(a) be withdrawn.

Regarding the rejection of independent Claim 23, this Claim includes similar recitations as those contained in independent Claim 1. Accordingly, it is respectfully submitted that Claim 23 is patentably distinct for at least the same reasons as set forth above with respect to Claim 1. Moreover, Claim 23 includes the recitation of wherein each local DC voltage generator receives a corresponding power control signal from said power control unit and a corresponding clock control signal from said clock control unit and generates a reference voltage based on a supply voltage using a plurality of diodes, another distinguishing element of the present application which has not been examined by the Examiner in the present Office Action. Based on at least the forgoing, withdrawal of the rejection of Claim 23 under 35 U.S.C. §103(a) is respectfully requested.

Independent Claims 1 and 23 are believed to be in condition for allowance. Without conceding the patentability per se of dependent Claims 2-12, 22, and 24, these are likewise believed to be allowable by virtue of their dependence on their respective amended independent claims. Accordingly, reconsideration and withdrawal of the rejections of dependent Claims -12,

22, and 24 is respectfully requested.

Accordingly, all of the claims pending in the Application, namely, Claims 1-12 and 22-24, are believed to be in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicants' attorney at the number given below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Musella", with a long horizontal flourish extending to the right.

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